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6 Attorneys for Defendants Zenith Capital, LLC;
 7 Tasker Cooper Smith/Zenith Group, Ltd;
 8 Tasker Cooper Smith/zenith Group, LLC;
 Rick Tasker, Jed Cooper, and Gregg Smith

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 CHARLES O. BRADLEY TRUST, et al.,)

12 Plaintiffs,)

13 v.)

14 ZENITH CAPITAL LLC, et al.,)

15 Defendants.)

Case No.: C 04 2239 BZ

STIPULATION AND ORDER TO
 PROTECT THE CONFIDENTIALITY OF
 DOCUMENTS CONTAINING
 DEFENDANTS' FINANCIAL
 INFORMATION TO BE PRODUCED TO
 PLAINTIFFS' COUNSEL

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 17 This Stipulation is entered into by and between Plaintiffs Charles O. Bradley Trust,
 18 Linda L. Bradley Trust, Ken & Sharon Burge Trust, Brad Martin Burge, Scott & Noa L.
 19 Dylstra, Ronald C. Hall, and Rental Center Properties (collectively "Plaintiffs"), and
 20 Defendants Zenith Capital LLC, Tasker Cooper Smith/Zenith Group Ltd, Tasker Cooper
 21 Smith/Zenith Group LLC, Rick L. Tasker, M. Jed Cooper, M. Gregg Smith, Pisenti & Brinker
 22 LLP, and Irwin S. Rothenberg (collectively "Defendants") by and through their respective
 23 counsel of record.

24 On or about May 3, 2005, the Court issued its Order Granting In Part Plaintiffs'
 25 Motion To Obtain Discovery Of Finances Of Defendants ("Order"). Pursuant to such
 26 Order, Defendants are required to "produce to Plaintiffs documents sufficient to establish
 27 their net worth and financial condition from 2004 to present." Such documents are to be
 28 produced subject to a strict protective order as described in the Order.

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that:

2 (1) Documents produced by Defendants pursuant to the Order shall be stamped
3 or otherwise clearly labeled as "Confidential;"

4 (2) Documents received by Plaintiffs' counsel labeled "Confidential" shall not be
5 circulated to Plaintiffs or the public, and shall be maintained for review by counsel and
6 necessary employees of counsel only, unless further disclosure is authorized by the Court
7 in a subsequent order;

8 (3) At the conclusion of this litigation (whether by settlement, dispositive
9 motion, or judgment), Plaintiffs' counsel shall destroy all originals and copies of documents
10 produced by Defendants which were produced pursuant to the Order and subject to this
11 Stipulation and Protective Order;

12 (4) In the event that Defendants fail to label as "Confidential" any document that
13 is properly subject to this Stipulation and Protective Order, at the request of counsel for
14 Defendants, Plaintiffs' counsel shall retrieve any such document, including all copies.
15 Counsel for Plaintiffs shall either return all such documents to counsel for Defendants or
16 shall destroy all such documents and provide written assurance to counsel for Defendants
17 of such destruction, and counsel for Defendants shall promptly provide to Plaintiffs'
18 counsel replacements bearing the appropriate label.

19 DATED: June 10, 2005

JOHNSON & MISKEL

20 By:



21 GERALD L. WILLIAMS

22 Attorneys for Plaintiffs Charles O. Bradley Trust, Linda
23 L. Bradley Trust, Ken & Sharon Burge
Trust, Brad Martin Burge, Scott & Noa L. Dykstra,
Ronald C. Hall, and Rental Center Properties

24 DATED: June 2, 2005

BACALSKI, BAILEY, KOSKA & OTTOSON, LLP

25 By:


26 A. DANIEL BACALSKI, JR.
27 DOUGLAS DUBÉ

28 Attorneys for Defendants Zenith Capital LLC, Tasker

Cooper Smith/Zenith Group LLC, Rick L. Tasker, M. Jed
Cooper, and M. Gregg Smith

DATED: June 7, 2005

Friedemann, Brien, Goldberg & Zariwsky LLP *FBZ*

By:

John F. Friedemann
JOHN F. FRIEDEMANN

KYLE M. FISHER

Attorneys for Pisenti & Brinker, LLP and
Irwin S. Rothenberg

PROTECTIVE ORDER

Based upon the stipulation of the Parties as set forth herein, and good cause
appearing therefore, IT IS HEREBY ORDERED:

(1) Documents produced by Defendants to Plaintiffs' counsel labeled
"Confidential" shall not be circulated to Plaintiffs or the public, and shall be maintained for
review by counsel and necessary employees of counsel only, unless further disclosure is
authorized by the Court in a subsequent order, and;

(2) At the conclusion of this litigation (whether by settlement, dispositive
motion, or judgment), Plaintiffs' counsel shall destroy all originals and copies of documents
produced by Defendants which were produced pursuant to the Order and subject to this
Stipulation and Protective Order.

IT IS SO ORDERED

DATED: June 15, 2005

Honorable Ed
United States

